

U.S. Application Serial No.
Docket No. YOR920010067US1
(YOR.271)

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REMARKS

In response to the Office Action dated June 13, 2005, and further to the RCE filed on September 13, 2005, please amend the above-identified application as follows prior to issuing a first Office Action after RCE.

Claims 1-17, 22-39, 44-45, and 47-55 are all the claims presently pending.

Claims 1-17, 22-39, 44-45, and 47-55 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Egger, et al. (U.S. Patent No. 6,233,571).

This rejection is respectfully traversed. Indeed, Applicant submits that all of the pending claims are patentable over the prior art of record.

In the Advisory Action mailed September 1, 2005, the Examiner alleges that the features upon which applicant relies are not recited in the claims.

While Applicant believes that the claims are patentable over the cited references, either alone or in combination, to speed prosecution and allowance of the application, Applicant amends independent claim 1 to define more clearly the features of the claimed invention.

Applicant notes that independent claim 1 recites, *inter alia*, that N is a cardinality of the collection of subject words of the data blocks.

The Examiner argues that the subject words of textual object include words, phrase, terms, keywords, paragraphs or portions, as allegedly disclosed at column 13, lines 50-67, column 14, lines 1-8, and column 5, lines 38-55 of Egger. However, contrary to the Examiner's position, in Egger, the number "n", which determines the cardinality of the

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matrix, is obtained from the number of "textual objects" that are to be searched, as noted in column 16, lines 66-67, and NOT from the number of "subjects" of the "textual objects."

That is, in Egger, the number "n" is obtained from the number of "textual objects" that are to be searched, and NOT from the "*subject words of the data blocks*", as claimed.

Thus, Egger does not teach or suggest a method of indexing data blocks according to a collection of subject words, which includes "*constructing a N-dimensional coordinate space, wherein N is a cardinality of the collection of subject words of the data blocks*", as defined by independent claim 1. Indeed, an important aspect of the claimed invention is that a coordinate space of N dimensions is built, where N is the number of subject words of the data blocks.

Moreover, in Egger, the Opinion Pattern Matrix is simply used to represent the similarity of any two documents in the system, as determined by a complex procedure. The "n by n" matrix is a two-dimensional matrix, and cannot be considered a N dimensional coordinate system, as in the claimed invention.

Applicant submits that neither Egger et al. nor any of the other prior art of record build such a coordinate space.

To summarize, in Egger et al., each row of the matrix represents the relationship of one document with all the other n-1 documents in the system. In contrast, in the present invention, each document is represented as a vector which has a position in a coordinate system of N key words. The relationship is INDEPENDENT of any other document.

The advantages of the inventive system are quite significant. In the inventive system, a document can be added to the coordinate space without impacting the measurements of any

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other document. In Egger's system, the addition of a single document would require the entire recomputation of all the "n by n" matrices.

For the foregoing reasons, Applicant submits that Egger does not disclose or suggest all of the features of claims 1-17, 22-39, 44, 45, and 47-55. Applicant submits that the claimed invention is patentable over Egger et al., either alone or in combination (arguendo) with any of the other prior art of record.

CONCLUSION

In view of the foregoing, Applicant submits that claims 1-17, 22-39, 44, 45, and 47-55, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

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The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

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CERTIFICATE OF TRANSMISSION

I certify that I transmitted via facsimile to (571) 273-8300 the enclosed Preliminary Amendment under 37 C.F.R. § 1.114 to Examiner Anh Ly, Group Art Unit 2162, on October 5, 2005.


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